

FEDERAL RAILROAD
ADMINISTRATION
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OFFICE OF CHIEF COUNSEL

ALASKA RAILROAD CORPORATION

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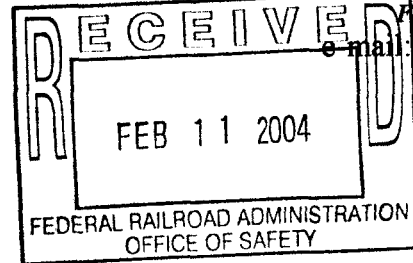
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Signal and Telecommunication
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January 27, 2004

Mr. George A. Gavalla
Associate Administrator for Safety
Federal Railroad Administration
400 Seventh Street, SW
Mail Stop 25
Washington, DC 20590



Dear Mr. Gavalla:

Alaska Railroad Corporation petitions the Federal Railroad Administration for relief from the requirements of Section 236.110 of the Federal Signal and Train Control Standards, 49 CFR. This will also serve as Alaska Railroad Corporation's request to utilize an electronic system for recording and maintaining applicable inspection and test records as defined in 49 CFR, Part 234, subject to approval by the administrator for safety, as required by Section 234.273.

Relief is requested from the requirement for each inspection record to be signed by the person making the inspection or test. In lieu of the signature, ARRC proposes to implement an electronic system to record and maintain Signal inspection records that provide inherent security measures that uniquely identify the person as the author of the record. Once a record is entered and verified, it cannot be modified.

Alaska Railroad Corporation believes that the electronic system will serve the best interest of Alaska Railroad Corporation and the Federal and State Inspection authorities that are required to inspect records. We also anticipate this system will provide many benefits, including:

- Improved availability of test records
- Improved management reporting of compliance
- Improved consistency for filing records
- A reduction in the need for paper documentation

A pilot program is scheduled to be implemented in the first quarter of 2004 on the Alaska Railroad.

If you have any questions regarding this petition or our electronic test and inspection filing system, please do not hesitate to contact Mr. Russell J. Frazier, Director Signal and Telecommunications, (907) 265-2301.

Sincerely,

Russell J. Frazier
Director Signal and Telecommunications

cc: Chuck Lewis/FRA
Eileen Reilly/ARRC
Andy Schiestl/ARRC
Jim Seeburger/ARRC

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